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February 16, 2022

BY ECF

Honorable Laura Taylor Swain
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

re: Farah, et al. v. Emirates, et al. 21-CV-5786 (LTS)

Dear Judge Swain,

My office represents plaintiffs Kayenat Farah, Joseph Cammarata, Violet Simpson, and Charlotte Armstrong (hereinafter referred to collectively as “Plaintiffs”) in this action, along with Risman & Risman, P.C. and Renaker Hasselman Scott LLP. In that capacity, I write jointly with John Porta, Esq., attorney for Defendants Emirates and Emirates Severance Plan, to sadly advise the Court of the passing of Plaintiff Joseph Cammarata. After the death of a plaintiff, a party or the decedent’s successor or representative may file a Suggestion of Death and seek amendment of the complaint to substitute a new party for the deceased party. Here, the parties request permission to delay filing the Suggestion of Death until such time as the Court has issued a decision on Defendants’ pending Motion to Dismiss. See Civil Docket Sheet, at Document Nos. 42 – 47. In the interest of judicial economy, delaying the filing of the Suggestion of Death until after a decision has been issued will enable Plaintiffs to decide if another class representative should be added to the litigation, and it will also enable Mr. Cammarata’s heirs to establish an estate to substitute in his place without hindering the progress of the case. The parties are in agreement that the substitution of Mr. Cammarata’s estate and/or the addition of another potential class representative would not impact the substantive arguments of the pending motion. As such, the parties respectfully request that the Court allow the parties to file the Suggestion of Death within 30 days of the Court issuing a decision on the pending motion to dismiss.

The parties thank the court for its consideration herein.

Respectfully submitted,

/s/ Evan Brustein

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cc: All parties (via ECF)

The Court thanks the parties for notifying it of this sad development. The foregoing request is granted and the parties shall file a Suggestion of Death within 30 days of the Court issuing a decision on the pending motion. Dkt. no. 48 resolved.

SO ORDERED.

2/16/2022

/s/ Laura Taylor Swain, Chief USDJ